

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DAVID W. WOOD

v.

No. 3:15-cv-594-MHL

CREDIT ONE BANK, N.A.

PLAINTIFF'S MOTION FOR RULE 37(c)(1) SANCTIONS

Plaintiff David W. Wood, by counsel, moves for sanctions pursuant to Fed. R. Civ. P. 37(c)(1) against Credit One Bank N.A. For the reasons stated in the accompanying memorandum of law, Plaintiff seeks an Order imposing the minimum appropriate sanction excluding any witnesses or evidence from use on a motion, hearing or at trial, that was not timely disclosed pursuant to Fed. R. Civ. P. 26(a)(1) & (e) before July 13, 2016. The Plaintiff respectfully requests the court order such other relief as appropriate.

Respectfully Submitted,

David William Wood,

/s/

Susan Mary Rotkis, VSB #40693

Leonard A. Bennett, VSB #37523

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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